

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ROBERT SCHMIDT, RUSSELL ADAMS, and
JASON TAYLOR, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

JAGUAR LAND ROVER NORTH
NORTH AMERICA, LLC,

Defendant.

Civil Action No. 2:18-cv-08528-CCC-JBC

**NOTICE OF MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE THAT on **July 19, 2021** at 9:00 a.m. or as soon thereafter as counsel may be heard, Plaintiffs Robert Schmidt, Jason Taylor, and Russell Adams (collectively, the “Plaintiffs” or “Named Plaintiffs” or “Class Representatives”) will move before the Honorable Claire C. Cecchi, U.S.D.J., of the United States District Court for the District of New Jersey, located at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order:

- 1) granting preliminary approval of the proposed class action Settlement;
- 2) preliminarily certifying, for settlement purposes only, and pursuant to the terms of the Settlement Agreement, the proposed Class for the purposes of providing notice to the members of the proposed Settlement Class; approving the form and content of, and directing the distribution of the proposed Class Notice and Claim Form, annexed as Exhibits to the Settlement Agreement;

- 3) appointing Kantrowitz, Goldhamer & Graifman, P.C. and Thomas P. Sobran, P.C., as lead settlement class counsel; and,
- 4) scheduling a date for the final approval hearing not earlier than two hundred and ten (210) days after preliminary approval is granted.

In support thereof, Plaintiffs have contemporaneously filed a supporting memorandum and Declaration of Gary S. Graifman with accompanying exhibits. Defendant Jaguar Land Rover North America, LLC, does not oppose Plaintiffs' requested relief set out in the memorandum and the accompanying [Proposed] Order.

For the reasons set forth in the supporting memorandum, Plaintiffs respectfully request that the Court grant their unopposed motion and enter the accompanying [Proposed] Order.

Dated: June 25, 2021

Respectfully submitted,

**KANTROWITZ, GOLDHAMER &
GRAIFMAN, P.C.**

/s/ Gary S. Graifman

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the __ day of June, 2021, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court, is available for viewing and downloading from the ECF system, and will be served by operation of the Court's electronic filing system (CM/ECF) upon all counsel of record.

s/ Gary S. Graifman
Gary S. Graifman, Esq.